

**STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
WATER BUREAU**

In the matter of:

ACO-SW10-001

Date Entered: 12.18.09

Fredric Maki  
25465 Ford Road  
Watton, Michigan 49970

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**ADMINISTRATIVE CONSENT ORDER**

This document results from allegations by the Department of Environmental Quality (DEQ), Water Bureau (WB). The DEQ alleges that Mr. Fredric Maki, doing-business-as (d.b.a.) J.F.K. Maki, who owns and operates a septage waste hauling and disposal company located at 25465 Ford Road, Watton, MI, Baraga County, is in violation of Part 117, Septage Waste Servicers (Part 117), of the NREPA, MCL 324.11701 et seq. Fredric is a person, as defined by Section 301 of the NREPA. Fredric Maki and the DEQ agree to resolve the violations set forth herein through entry of an Administrative Consent Order (Consent Order).

**I. STIPULATIONS**

Fredric Maki and the DEQ stipulate as follows:

- 1.1 The NREPA MCL 324.101 et seq., is an act that controls pollution to protect the environment and natural resources in the state.
- 1.2 Part 117 of the NREPA, MCL 324.11701(z) et seq., regulates cleaning, removing, transporting, or disposing, by application to land or otherwise, of septage waste.
- 1.3 Part 117 of the NREPA, MCL 324.11716 allows certification of a city, county, or district health department to carry out certain powers and duties as agents of the DEQ. The Western Upper Peninsula District Health Department (Health Department) is duly authorized under the provisions of a contract with the DEQ to carry out said duties.

- 1.4 The Administrative Procedures Act, 1969 PA 306, as amended (APA), specifies, among other things, certain state agency administrative procedures for licensing, license revocation or suspension, and the disposition of contested cases.
- 1.5 Fredric Maki stipulates to the issuance and entry of this Consent Order to comply by consent and stipulates that the resolution of this matter by a final order to be entered as a Consent Order is proper and acceptable. Fredric Maki further agrees not to contest the issuance of this Consent Order and agrees to waive his rights to contest the issuance of this Consent Order through the APA. This Consent Order, thus, shall be considered a final order of the DEQ and shall become effective on the date it is signed by the chief of the WB, as designee of the director, pursuant to Section 301(b) of the NREPA.
- 1.6 Fredric Maki and the DEQ agree that the signing of this Consent Order is for settlement purposes only and does not constitute an admission by Fredric Maki that the law has been violated.
- 1.7 The Signatory to this Consent Order on behalf of the Fredric Maki agrees and attests that he is fully authorized to assure that Fredric Maki will comply with all requirements under this Consent Order.
- 1.8 Fredric Maki shall achieve compliance with the aforementioned regulations in accordance with the requirements contained in Section III, Compliance Program, of this Consent Order.

## **II. MDEQ's FINDINGS**

- 2.1 On September 14, 2006, the MDEQ issued to Frederic Maki a license (and related permits) to remove, transport, and dispose of septic waste, all in the business name of "J.F.K. Maki." The issuance of the license and permits was based on the sworn information supplied by Frederic Maki that J.F.K. Maki was a legal business entity. However, under the laws of the State of Michigan, there is no entity legally using the name J.F.K. Maki or any similar name. There is no filing with the state or any county that

recognizes the creation of an entity under the name J.F.K. Maki. The issuance of Septage License No. 07-01 and related permits to an entity that does not legally exist, and issuance of any license as a result of sworn but false information provided in an application, constitutes and results in violations of Sections 11702(1), 11703, and 11719 of Part 117 of the NREPA.

- 2.2 On September 18, 2007, Fredric Maki was transporting septage waste in a vehicle (VIN C6536J1419600) without a current annual Federal Motor Carrier safety inspection, in violation of Section 11705 of Part 117 of the NREPA.
- 2.3 On August 8, 2007, and September 18, 2007, the Health Department and the Keweenaw Bay Indian Community Tribal Police observed that Fredric Maki applied septage waste to land that was not applied uniformly at agronomic rates. The septage waste was discharged by stationary dumping to the ground surface and formed a concentrated stream of waste that discharged down a slope, threatening to enter into waters of the state, in violation of Section 11710(a) of Part 117 of the NREPA (See Exhibit A).
- 2.4 On or about August 8, 2007, and September 18, 2007, Fredric Maki applied septage waste to the surface of land where slopes exceed 6 percent, in violation of Section 11710(e) of Part 117 of the NREPA (See Exhibit A).
- 2.5 On August 8, 2007, and September 18, 2007, the Health Department and the Keweenaw Bay Indian Community Tribal Police observed that Mr. Fredric Maki applied to the surface of land septage waste that was not incorporated within six hours, in violation of Section 11710(g)(i) of Part 117 of the NREPA. Health Department staff and Keweenaw Bay Indian Community Tribal Police informed the MDEQ that they had observed unincorporated septage waste on the ground surface more than six hours after the septage waste was applied (See Exhibit A).
- 2.6 On August 8, 2007, and September 18, 2007, the Health Department and the Keweenaw Bay Indian Community Tribal Police observed that Fredric Maki applied to the surface of land septage waste that was not screened, in violation of Section 11710(l) of Part 117 of

the NREPA. Health Department staff observed that solid waste materials such as toilet paper mixed in with the septage waste were discharged onto the ground surface (See Exhibit A).

- 2.7 Since 2003, Fredric Maki has not submitted any septage transportation/disposal volume records, applied agriculture rate calculations, soil sampling/analysis results, cropping plans, or disposal complaints, in violation of Section 11703(5) of Part 117 of the NREPA.
- 2.8 On July 9, 2008, an informal hearing was conducted in accordance with *Rogers v State Board of Cosmetology*, 68 Mich App 751 (1976) and the APA, MCL §24.201 *et seq.* The result of the hearing was a finding by the MDEQ, WB, that Part 117 violations existed and that revocation of the subject Part 117 license and permits remained the intended action.

### **III. COMPLIANCE PROGRAM**

IT IS THEREFORE AGREED AND ORDERED THAT Fredric Maki shall take the following actions to prevent further violations of Part 117:

- 3.1 Fredric Maki shall implement and comply with all of the requirements in Section III, all of the conditions of this Consent Order, and Part 117.
- 3.2 Fredric Maki agrees to voluntarily terminate, revoke, and surrender of all of its licenses and permits associated with its Septage Waste Services License as part of the requirements of this Consent Order. Fredric Maki's voluntary termination, revocation, and surrender of all of its licenses and permits shall take effect on the date of the execution of this Consent Order.
- 3.3 Fredric Maki shall not engage in the practice of septage waste hauling or land application in any manner unless and until he again obtains all required license(s) and permits from the DEQ.

3.4 In the event that Fredric Maki on behalf of himself or on behalf of any other business or legal entity of which he is a member, officer, director, employee, or is in any other way affiliated with that entity chooses to pursue Septage Waste Services and Vehicle Licenses and a land application permit consistent with Part 117 and this Consent Order, he and the entity shall undertake the following corrective program to address the program deficiencies as detailed in Section II of this Consent Order and the following:

- a) Provide a photo copy of birth certificate and driver license to the DEQ if Fredric Maki applies for a license and/or permit as an individual or as a d.b.a. In the event that Fredric Maki applies for licenses and/or permits on behalf of any other business or legal entity of which he is a member, officer, director, employee, or is in any other way affiliated with that entity then Fredric Maki shall provide to the DEQ the identification number assigned by the Michigan Department of Energy, Labor, and Economic Growth to those businesses or legal entities registered to conduct business in the State of Michigan.
- b) The septage hauling vehicle used to haul septage waste shall pass inspections conducted by the Health Department and the Michigan State Police. Fredric Maki shall provide the DEQ copies of the inspection report from the Health Department and the Motor Carrier Safety Inspection Certification as proof that the vehicle is suitable for hauling septage waste.
- c) Fredric Maki shall maintain the septage waste vehicle and accessory equipment shall be kept clean and maintained in a manner that prevents environmental damage or harm to the public health.
- d) If Land Application of the septage waste is intended:
  - i. Submit a complete land site permit application that meets the requirements under Part 117 and document entitled "Information Needed by DEQ from the Septage Firm When Requesting Authorization to Land Apply Septage Waste" found under Attachment A of this Consent Order.

- ii. Employ the services of a Comprehensive Nutrient Management Planner (CNMP) approved by the DEQ. See Attachment B for the list of CNMPs available for hire.
  - 1. The contractor shall collect composite soil samples for analysis per Section 11709 (e) of Part 117 for the proposed site. The results shall be submitted to the DEQ for review. Authorization from the DEQ to use either site for the land application of septage waste shall be dependent upon the results of the analytical data. See Attachment C for the list of facilities that conduct the analysis.
  - 2. Prepare and submit an approvable cropping plan that meets the requirements of Part 117.
- iii. Obtain and utilize equipment to properly land apply and incorporate septage waste into the soil in accordance with Part 117.
  - e) If the septage waste is intended to be disposed at a wastewater treatment plant (WWTP), then Fredric Maki shall provide the DEQ with written proof that permission or authorization from a local WWTP that is certified by the DEQ was given to Fredric Maki on behalf of himself, d.b.a. or on behalf of any other business or legal entity of which he is a member, officer, director, employee, or is in any other way affiliated with that entity.
  - f) Prior to the submission of application for a Septage Waste Servicer License, obtain thirty hours of training provided by the DEQ as required under Part 117.
  - g) Fredric Maki shall maintain all records and submit any septage transportation and disposal volume records, applied agriculture rate calculations, soil sampling/analysis results, cropping plans, or disposal complaints to the DEQ as required under Part 117.

- 3.5 Provided that the requirements of paragraph 3.4 and this Consent Order are successfully demonstrated and any additional requirements of Part 117 are completed, the DEQ agrees not to unreasonably deny authorizing subject to the terms of this Consent Order.
- 3.6 In the event that Fredric Maki on behalf of himself, an assumed name or d.b.a., or on behalf of any other business or legal entity of which he is a member, officer, director, employee, or is in any other way affiliated, obtains a Septage Waste Services License, Vehicle License and/or Land Application Site permit, and fails to meet the requirements of Part 117, then Fredric Maki shall agree that any Septage Waste Servicer and Vehicle Licenses, and Land Application Site Permit shall be automatically terminated. By entering into this Consent Order, Fredric Maki waives the right to formally contest said revocation through Circuit Court or the APA.
- 3.7 In the event that Fredric Maki's license is revoked pursuant to item 3.6, Fredric Maki agrees that he shall not apply for a Septage Waste Servicers License in any capacity either on behalf of himself or on behalf of any other business or legal entity of which he is a member, officer, director, employee, or is in any other way affiliated with that entity; and Fredric Maki shall not engage in the practice of septage waste hauling or land application in any manner.
- 3.8 Fredric Maki shall submit all reports, work plans, specifications, schedules, or any other writing required by this section to Matthew Campbell, On-site Wastewater Unit, WB, P.O. Box 30273, Lansing, Michigan 48909-7773. The cover letter with each submittal shall identify the specific paragraph and requirement of this Consent Order that the submittal is intended to satisfy.

#### **IV. DEQ APPROVAL OF SUBMITTALS**

- 4.1 For any work plan, proposal, or other document, excluding applications for permits or licenses, that are required by this Consent Order to be submitted to the DEQ by Fredric Maki, the following process and terms of approval shall apply.

- 4.2 All work plans, proposals, and other documents required to be submitted by this Consent Order shall include all of the information required by the applicable statute and/or rule, and all of the information required by the applicable paragraph(s) of this Consent Order.
- 4.3 In the event the DEQ disapproves a work plan, proposal, or other document, it will notify Fredric Maki, in writing, specifying the reasons for such disapproval. Fredric Maki shall submit, within 30 days of receipt of such disapproval, a revised work plan, proposal, or other document which adequately addresses the reasons for the DEQ's disapproval. If the revised work plan, proposal, or other document is still not acceptable to the DEQ, the DEQ will notify Fredric Maki of this disapproval.
- 4.4 In the event the DEQ approves with specific modifications, a work plan, proposal, or other document, it will notify Fredric Maki, in writing, specifying the modifications required to be made to such work plan, proposal, or other document prior to its implementation and the specific reasons for such modifications. The DEQ may require Fredric Maki to submit, prior to implementation and within 30 days of receipt of such approval with specific modifications, a revised work plan, proposal, or other document which adequately addresses such modifications. If the revised work plan, proposal, or other document is still not acceptable to the DEQ, the DEQ will notify Fredric Maki of this disapproval.
- 4.5 Upon DEQ approval, or approval with modifications, of a work plan, proposal, or other document, such work plan, proposal, or other document shall be incorporated by reference into this Consent Order and shall be enforceable in accordance with the provisions of this Consent Order.
- 4.6 Failure by Fredric Maki to submit an approvable work plan, proposal, or other document, within the applicable time periods specified above, constitutes a violation of this Consent Order and shall subject Fredric Maki to the enforcement provisions of this Consent Order, including the stipulated penalty provisions specified in paragraph 9.2.



- 4.7 Any delays caused by Fredric Maki's failure to submit an approvable work plan, proposal, or other document when due shall in no way affect or alter Fredric Maki's responsibility to comply with any other deadline(s) specified in this Consent Order.
- 4.8 No informal advice, guidance, suggestions, or comments by the DEQ regarding reports, work plans, plans, specifications, schedules or any other writing submitted by Fredric Maki will be construed as relieving Fredric Maki of its obligation to obtain written approval, if and when required by this Consent Order.

#### V. EXTENSIONS

- 5.1 Fredric Maki and the DEQ agree that the DEQ may grant Fredric Maki a reasonable extension of the specified deadlines set forth in this Consent Order. Any extension shall be preceded by a written request in duplicate to the DEQ, WB, Enforcement Unit Chief, Constitution Hall, 525 West Allegan Street, Lansing, Michigan 48909-7773, and to Matthew Campbell at the address in paragraph 3.8, no later than ten business days prior to the pertinent deadline, and shall include:
- a. Identification of the specific deadline(s) of this Consent Order that will not be met.
  - b. A detailed description of the circumstances that will prevent Fredric Maki from meeting the deadline(s).
  - c. A description of the measures Fredric Maki has taken and/or intends to take to meet the required deadline.
  - d. The length of the extension requested and the specific date on which the obligation will be met.

The district supervisor, in consultation with the Enforcement Unit Chief, shall respond in writing to such requests. No change or modification to this Consent Order shall be valid unless in writing from the DEQ, and if applicable, signed by both parties.

#### VI. REPORTING

- 6.1 Fredric Maki shall verbally report any violation(s) of the terms and conditions of this Consent Order to the Matthew Campbell, On-Site Wastewater Unit by no later than the close of the next business day following detection of such violation(s) and shall follow such notification with a written report within five business days following detection of such violation(s). The written report shall include a detailed description of the violation(s), as well as a description of any actions proposed or taken to correct the violation(s). Fredric Maki shall report any anticipated violation(s) of this Consent Order to the above-referenced individual in advance of the relevant deadlines whenever possible.

#### VII. RETENTION OF RECORDS

- 7.1 Upon request by an authorized representative of the DEQ, Fredric Maki shall make available to the DEQ all records, plans, logs, and other documents required to be maintained under this Consent Order or pursuant to Part 31 or its rules. All such documents shall be retained by Fredric Maki for at least a period of three years from the date of generation of the record unless a longer period of record retention is required by Part 31 or its rules.

#### VIII. RIGHT OF ENTRY

- 8.1 Fredric Maki shall allow any authorized representative or contractor of the DEQ, upon presentation of proper credentials, to enter upon the premises of Frederic Maki's Part 117 commercial operations at all reasonable times for the purpose of monitoring compliance with the provisions of this Consent Order. This paragraph in no way limits the authority of the DEQ to conduct tests and inspections pursuant to the NREPA and the rules promulgated thereunder, or any other applicable statutory provision.

#### IX. PENALTIES

- 9.1 Fredric Maki agrees to pay a civil fine of **THREE HUNDRED (\$300) DOLLARS** to the State of Michigan for the violations specified in Section II of this Consent Order. The

\$300 payment shall be made within 90 days of the effective date of this Consent Order and shall be made in accordance with paragraph 9.6.

9.2 For each failure to comply with the provisions of Section III and IV of this Consent Order, Fredric Maki shall pay stipulated penalties of **\$500** per violation per day for 1 to 7 days of violation, **\$1000** per violation per day for 8 to 14 days of violation, and **\$1500** per violation per day for each day of violation thereafter. Failure to perform any of the following requirements shall be considered separate violations of this Consent Order and are subject to stipulated penalties under this paragraph:

- a. Failure to submit an approvable work plan, proposal, or other document by the required dates in accordance with Section III.
- b. Failure to implement, complete, or comply with any activity or condition required by Section III, including those contained in any approved work plan or other document required to be implemented and completed by Section III.
- c. Failure to submit approvable revised work plans, proposals, or other documents addressing a DEQ disapproval or approval with modifications by the required dates in accordance with paragraphs 4.3 or 4.4.

9.3 For each failure to comply with any other provision of this Consent Order not specified in paragraph 9.2, Fredric Maki shall pay stipulated penalties of **\$1500** per violation per day for each day of violation. Failure to perform any of the following requirements shall be considered separate violations of this Consent Order and are subject to stipulated penalties under this paragraph:

- a. Failure to verbally report violations and submit written reports by the required dates in accordance with paragraph 6.1.
- b. Failure to retain records on site in accordance with paragraph 7.1.
- c. Failure to pay civil fines, costs, or stipulated or interest penalties by the required dates in accordance with this section.
- d. Any other requirement of this Consent Order.

- 9.4 Stipulated penalties accruing under paragraphs 9.2 or 9.3 shall be paid within 30 days in accordance with paragraph 9.6 after written demand by the DEQ.
- 9.5 To ensure timely payment of the above civil fine, costs, and stipulated penalties, Fredric Maki shall pay an interest penalty to the General Fund of the State of Michigan each time it fails to make a complete or timely payment. This interest penalty shall be based on the rate set forth at MCL 600.6013(8), using the full increment of amount due as principal, and calculated from the due date for the payment until the delinquent payment is finally made in full.
- 9.6 Fredric Maki agrees to pay all funds due pursuant to this agreement by check made payable to the State of Michigan and delivered to the DEQ, Revenue Control Unit, P.O. Box 30657, Lansing, Michigan 48909-8157. To ensure proper credit, all payments made pursuant to this Consent Order must include the **Payment Identification No. WB WTR-1129**.
- 9.7 Fredric Maki agrees not to contest the legality of the civil fine paid pursuant to paragraph 9.1, above. Fredric Maki further agrees not to contest the legality of any stipulated penalties or interest penalties assessed pursuant to paragraphs 9.2, 9.3, and 9.4, above, but reserves the right to dispute the factual basis upon which a demand by the DEQ for stipulated penalties or interest penalties is made.

#### **X. FORCE MAJEURE**

- 10.1 Fredric Maki shall perform the requirements of this Consent Order within the time limits established herein, unless performance is prevented or delayed by events that constitute a "Force Majeure." Any delay in the performance attributable to a "Force Majeure" shall not be deemed a violation of Fredric Maki's obligations under this Consent Order in accordance with this section.
- 10.2 For the purpose of this Consent Order, "Force Majeure" means an occurrence or nonoccurrence arising from causes not foreseeable, beyond the control of, and without

the fault of Fredric Maki, such as: an Act of God, untimely review of permit applications or submissions by the DEQ or other applicable authority, and acts or omissions of third parties that could not have been avoided or overcome by Fredric Maki's diligence and that delay the performance of an obligation under this Consent Order. "Force Majeure" does not include, among other things, unanticipated or increased costs, changed financial circumstances, or failure to obtain a permit or license as a result of Fredric Maki's actions or omissions.

- 10.3 Fredric Maki shall notify the DEQ, by telephone, within 48 hours of discovering any event that causes a delay in its compliance with any provision of this Consent Order. Verbal notice shall be followed by written notice within ten calendar days and shall describe, in detail, the anticipated length of delay, the precise cause or causes of delay, the measures taken by Fredric Maki to prevent or minimize the delay, and the timetable by which those measures shall be implemented. Fredric Maki shall adopt all reasonable measures to avoid or minimize any such delay.
- 10.4 Failure of Fredric Maki to comply with the notice requirements and time provisions under paragraph 10.3 shall render this Section X void and of no force and effect as to the particular incident involved. The DEQ may, at its sole discretion and in appropriate circumstances, waive in writing the notice requirements of paragraph 10.3, above.
- 10.5 If the parties agree that the delay or anticipated delay was beyond the control of Fredric Maki, this may be so stipulated, and the parties to this Consent Order may agree upon an appropriate modification of this Consent Order. However, the DEQ is the final decision-maker on whether or not the matter at issue constitutes a force majeure. The parties to this Consent Order understand and agree that the final decision by the DEQ regarding a force majeure claim is not subject to judicial review. The burden of proving that any delay was beyond the reasonable control of Fredric Maki, and that all the requirements of this Section X have been met by Fredric Maki, rests with Fredric Maki.
- 10.6 An extension of one compliance date based upon a particular incident does not necessarily mean that Fredric Maki qualifies for an extension of a subsequent compliance

date without providing proof regarding each incremental step or other requirement for which an extension is sought.

## **XI. GENERAL PROVISIONS**

- 11.1 With respect to any violations not specifically addressed and resolved by this Consent Order, the DEQ reserves the right to pursue any other remedies to which it is entitled for any failure on the part of Fredric Maki to comply with the requirements of the NREPA and its rules.
- 11.2 The DEQ and Fredric Maki consent to enforcement of this Consent Order in the same manner and by the same procedures for all final orders entered pursuant to Part 31, MCL 324.3101 et seq.; and enforcement pursuant to Part 17, Michigan Environmental Protection Act, of the NREPA, MCL 324.1701 et seq.
- 11.3 This Consent Order in no way affects Fredric Maki's responsibility to comply with any other applicable state, federal, or local laws or regulations.
- 11.4 The WB reserves its right to pursue appropriate action, including injunctive relief to enforce the provisions of this Consent Order, and at its discretion, may also seek stipulated fines or statutory fines for any violation of this Consent Order. However, the WB is precluded from seeking both a stipulated fine under this Consent Order and a statutory fine for the same violation.
- 11.5 Nothing in this Consent Order is or shall be considered to affect any liability Fredric Maki may have for natural resource damages caused by Fredric Maki's ownership and/or operation of Frederic Maki's Part 117 commercial operations. The State of Michigan does not waive any rights to bring an appropriate action to recover such damages to the natural resources.
- 11.6 In the event Fredric Maki sells or transfers Frederic Maki's Part 117 commercial operations, he shall advise any purchaser or transferee of the existence of this Consent

Order in connection with such sale or transfer. Within 30 calendar days, Fredric Maki shall also notify the Matthew Campbell, On-site Wastewater Unit, WB, P.O. Box 30273, Lansing, Michigan 48909-7773 in writing, of such sale or transfer, the identity and address of any purchaser or transferee, and confirm the fact that notice of this Consent Order has been given to the purchaser and/or transferee. The purchaser and/or transferee of this Consent Order must agree, in writing, to assume all of the obligations of this Consent Order. A copy of that agreement shall be forwarded to Matthew Campbell, On-site Wastewater Unit, WB, P.O. Box 30273, Lansing, Michigan 48909-7773 within 30 days of assuming the obligations of this Consent Order.

- 11.7 The provisions of this Consent Order shall apply to and be binding upon the parties to this action, and their successors and assigns.
- 11.8 This Consent Order constitutes a civil settlement and satisfaction as to the resolution of the violations specifically addressed herein; however, it does not resolve any criminal action that may result from these same violations.

## **XII. TERMINATION**

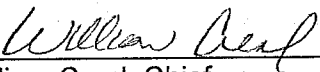
- 12.1 This Consent Order shall remain in full force and effect until terminated by a written Termination Notice (TN) issued by the DEQ. Prior to issuance of a written TN, Fredric Maki shall submit a request consisting of a written certification that Fredric Maki has fully complied with the requirements of this Consent Order and has made payment of any fines, including stipulated penalties, required in this Consent Order. Specifically, this certification shall include:
- a. The date of compliance with each provision of the compliance program in Section III, and the date any fines or penalties were paid.
  - b. A statement that all required information has been reported to the district supervisor.
  - c. Confirmation that all records required to be maintained pursuant to this Consent Order are being maintained at Frederic Maki's Part 117 commercial operations.

The DEQ may also request additional relevant information. The DEQ shall not unreasonably withhold issuance of a TN.

Signatories

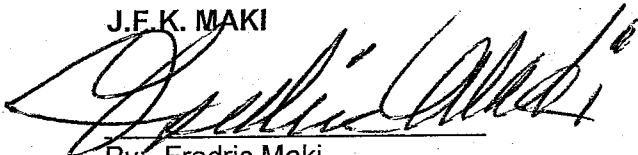
The undersigned CERTIFY they are fully authorized by the party they represent to enter into this Consent Order to comply by consent and to EXECUTE and LEGALLY BIND that party to it.

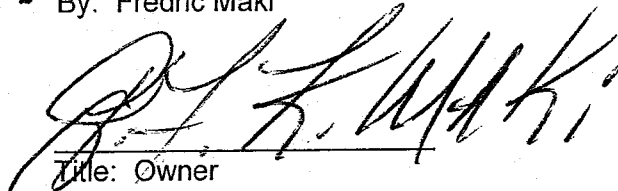
DEPARTMENT OF ENVIRONMENTAL QUALITY

  
\_\_\_\_\_  
William Creal, Chief  
Water Bureau

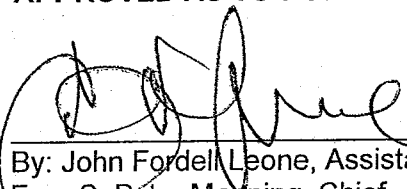
12-18-09  
Date

J.F.K. MAKI

  
\_\_\_\_\_  
By: Fredric Maki

  
\_\_\_\_\_  
Title: Owner  
12-4-09  
Date

APPROVED AS TO FORM:

  
\_\_\_\_\_  
By: John Fordell Leone, Assistant Attorney General  
For: S. Peter Manning, Chief  
Environment, Natural Resources, and Agriculture Division  
Michigan Department of Attorney General  
12-10-09  
Date